

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 23 2017

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEMOND MCDANIELS,

Defendant.

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) No.
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4:17CR00381 SNLJ/SPM

INDICTMENT

COUNT ONE
(WIRE FRAUD)

The Grand Jury Charges that:

1. In about February 2017, within the Eastern District of Missouri,

DEMOND MCDANIELS,

the defendant herein, did knowingly devise and execute and intend to devise and execute a scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, in that defendant fraudulently applied for credit by listing false information on his credit application pertaining to his address, employer, and social security number.

2. In November and December 2016, and January and February 2017, defendant was under the supervision of the United States Probation Office ("Probation") in case number 4:05CR332ERW.

3. The conditions of defendant's supervision required him to provide Probation with his current residence and employment for November and December 2016, and January and February 2017.

4. On or about February 9, 2017 and June 15, 2017, defendant stated to Probation in reporting forms ("Prob 8") that during the months of November and December 2016, and January and February 2017 that he resided at an apartment on the street "Whitburn" in St. Louis, Missouri and that he was employed at a cleaning service.

5. It was part of the scheme and artifice that on or about February 8, 2017, defendant attempted to execute a scheme to purchase a 2015 Chrysler 200 and 2008 Mercedes-Benz, C Class, from Lou Fusz Mitsubishi ("Lou Fusz") by submitting to Lou Fusz an application to obtain credit to purchase the vehicles with the application containing false information pertaining to defendant's employment, social security number, and address.

6. It was part of the scheme and artifice that on or about February 8, 2017 defendant sought financing to purchase the 2015 Chrysler 200 by completing an application that he submitted to Lou Fusz. Defendant falsely stated in that application that he had then been employed for 5 years as a property manager with "RLW Property Investments" and that he earned \$6,000 monthly. Defendant also falsely listed his social security number as ending with the numbers 8933. Defendant also submitted pay records that falsely stated that his year to date net pay for the year 2016 from "RLW Properties Investments, LLC" was approximately \$60,368.33. Defendant also falsely listed that he resided on a street called "East Edgar Av" in St. Louis, Missouri and that he had resided there for one year.

7. It was part of the scheme and artifice that on or about February 8, 2017, defendant caused Lou Fusz to submit his credit application by wire communication in interstate commerce to several financial institutions, including PNC Bank, NA ("PNC") in Pittsburg, Pennsylvania. Defendant's application was declined by PNC.

8. On or about February 7, 2017, in the Eastern District of Missouri,

DEMOND McDANIELS,

the defendant herein, for the purpose of executing the aforementioned scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations, and promises, caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, in that defendant submitted to Lou Fusz a credit application that he caused to be sent by wire communication in interstate commerce from the Eastern District of Missouri to PNC, outside of the state of Missouri, for purchase of a 2015 Chrysler 200, with said application containing false information pertaining to defendant's employer, pay, social security number, and address.

In violation of Title 18, United States Code, Section 1343 and 2.

A TRUE BILL.

FOREPERSON

CARRIE COSTANTIN
Acting United States Attorney

ANTHONY L. FRANKS, #50217MO
Assistant United States Attorney